



CORNERSTONE

Environmental Group, LLC

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VIA E-MAIL AND US MAIL

March 5, 2013

Mr. Jonathan Gorin
Remedial Project Manager
United States Environmental Protection Agency, Region II
290 Broadway
19th Floor
New York, New York 10007-1866

Subject: Monthly Progress Report for February 2013
LCP Chemicals, Inc. Superfund Site (USEPA ID# NJD079303020)

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Dear Mr. Gorin:

The following monthly progress report is submitted on behalf of ISP Environmental Services Inc. (IES) in satisfaction of the Section VIII.35 requirements of Administrative Order No. II CERCLA-02-99-2015 (hereinafter referred to as the Order) issued by USEPA and as executed by IES on May 13, 1999.

A "Gantt Chart" project schedule is provided as an attachment (Figure 1). This project schedule provides graphical representations of the project tasks and subtasks. Accordingly, the project schedule depicts the task completion through the end of the reporting month and provides an estimate of the timing of future tasks.

1. Previous Actions in Compliance with the Order

A. The following actions have been taken to comply with the Order during the previous month:

- Continued coordination with the USEPA on resolving comments on the *Draft Remedial Investigation Report* (RIR), which is pending final input from the USEPA.
- Continued work on responding to comments on the *Draft Baseline Ecological Risk Assessment* (Appendix Q to the RIR), based on final comments received from the Agency in a letter dated January 16, 2013.
- Continued coordination with the USEPA on final resolution of comments on the *Draft Feasibility Study* (FS), based on final comments received from the Agency in a letter dated February 11, 2013.

B. The following documents were submitted to the agencies during the previous month:

- Monthly progress letter report dated February 7, 2013, including an updated project schedule dated February 1, 2013.

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- Letter from John Hoffman of Ashland to Jonathan Gorin of the USEPA, dated January 10, 2013, providing notification of a new Ashland project coordinator for the LCP site.
- C. The following agency approvals were received during the previous month:
 - None during the reporting period.
- D. The following agency documents and correspondences were received during the previous month:
 - Letter from Carole Peterson of the USEPA, dated February 11, 2013, to John Hoffman of Ashland, transmitting final comments on the *Draft Feasibility Study* report.
- E. Other pertinent communications with the agencies during the previous month:
 - Electronic mail message from Carrie McGowan of EHS-Support to Jonathan Gorin of the USEPA, dated February 19, 2013, requesting an extension to March 31, 2013, of the due date for submittal of a Final BERA per the USEPA's January 16, 2013 comment letter which indicated submittal by February 28, 2013.
 - Electronic mail message from Jonathan Gorin of the USEPA to Carrie McGowan of EHS-Support, dated February 19, 2013, approving the extension of the submittal date for the Final BERA.

2. Future Actions, Data, and Plans

- A. The following actions, data, and plans are scheduled to be conducted during the following two (2) months contingent on the USEPA's schedule for final input on previously submitted documents and responses to Agency comments:
 - Follow up on the final response to comments from the USEPA on the *Draft Remedial Investigation Report* submitted by IES, and after confirmation that the comments have been resolved, begin preparation of the *Final Remedial Investigation Report*.
 - Address the final comments from the USEPA on the *Draft Baseline Ecological Risk Assessment* (BERA) submitted by IES, and prepare a final BERA.
 - Address the final comments from the USEPA on the *Draft Feasibility Study* report submitted by IES, and prepare a final FS report.
 - Continue work to properly dispose of the tank that moved during Hurricane Sandy.
- B. Other information related to the progress of work:
 - None during this reporting period.

3. Project Schedule

- A. The percentage of completion of the project subtasks has been updated and is shown on the overall project schedule (Figure 1). Many of the schedule subtask details including the Phase I and Phase II RI field investigations and the treatability study determination process are 100% complete and have been collapsed for presentation brevity on Figure 1. With the submittal to the

USEPA of the revised draft RI report and the draft FS report, the schedule is controlled by the USEPA review process. Coordination with the USEPA is ongoing regarding the review process. Based on the current status of final input from the USEPA on the RI and the FS and previously submitted response to comments documents, the schedule was updated with the January 2013 progress report to provide an additional approximately two months to conclude the review process. The schedule is unchanged from the January progress report. As the time necessary to complete the review process is further defined, the schedule will be updated accordingly.

- B. Delays that have been encountered or anticipated that may affect the future schedule for completion of the work:
- No specific delays are being encountered at this time, and the current schedule reflects the completion of draft RI and FS reports, as described above. However, resolution of comments is pending on the revised RI and draft FS.
- C. Description of efforts made to mitigate these delays or anticipated delays:
- None necessary at this time.


4. Funding Mechanism

- A. An Irrevocable Letter of Credit No. P-224827, issued by JP Morgan Bank effective April 25, 2002, and associated Standby Trust Agreement were issued in satisfaction of the financial assurance obligations of the Order as documented to USEPA in a letter from Celeste Wills, Esq. of IES, dated April 26, 2002.

If you or your staff has any questions or comments, please do not hesitate to contact John Hoffman of Ashland Inc. at 302-995-3485.

Sincerely,

CORNERSTONE ENVIRONMENTAL GROUP, LLC

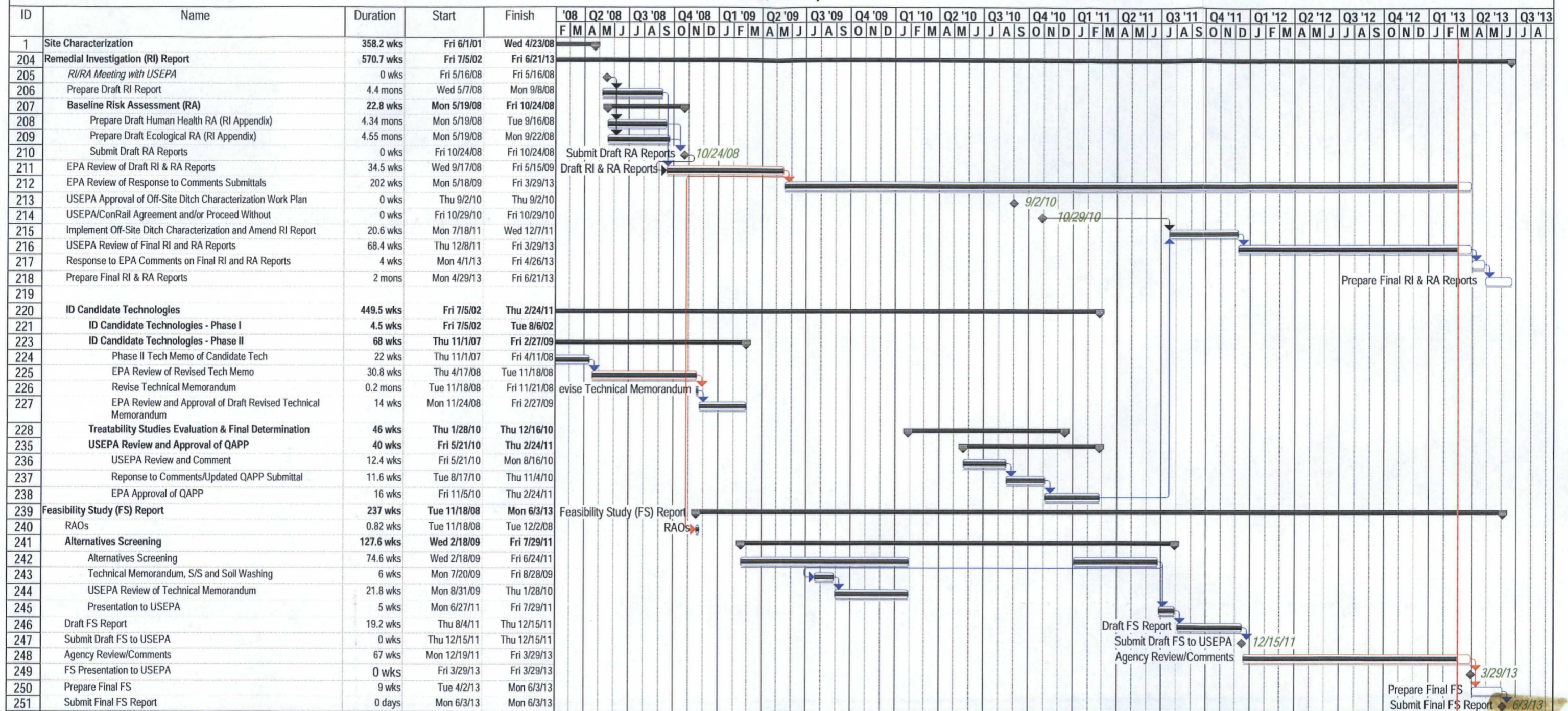


Gary J. DiPippo, P.E.
Manager, Hydrogeology and Remediation

Enclosure

- | | |
|------------------------------|----------------------------------|
| cc: J. Hoffman, Ashland Inc. | C. McGowan, EHS Support |
| S. Miller, NJDHSS | S. MacMillin, Brown and Caldwell |
| F. Cardiello, Esq., USEPA | K. Tolson, Geosyntec |
| D. Toft, Esq. | M. DeFlaun, Geosyntec |
| A. Pavelka, NJDEP | J. Kubitz, Entrix |
| R. Lampkin, Ashland | |

Figure 1
RI/FS PROJECT SCHEDULE
LCP Chemicals, Inc. Superfund Site



Task Progress Milestone Summary